

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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March 18, 2022

By ECF

Honorable Valerie Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 3/20/2022

Re: *United States v. Martin Reyes*, 20 Cr. 159 (VEC)

Dear Judge Caproni:

I write, without objection from the Government, to request a one-month adjournment of Mr. Reyes's voluntary surrender, currently scheduled for March 25, 2022.

I request this adjournment for two reasons. First, Mr. Reyes still has not received his Bureau of Prisons designation. As noted at the time of Mr. Reyes's sentencing, he is most likely to receive appropriate and uninterrupted mental health care if permitted to surrender directly to the facility where he will serve his time, rather than to a local jail. Dkt. No. 38 at 7. Second, Mr. Reyes is hoping to take a few additional measures to place his family on more secure footing, in terms of their housing situation and income, prior to his term of incarceration. He is now working with my office's social work department in his efforts to do so.

As noted, the Government does not object to this request. Thank you for considering it.

Respectfully submitted,

/s/ Ariel Werner
Ariel Werner
Assistant Federal Defender
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cc: Juliana Murray, Assistant U.S. Attorney

Application GRANTED. Mr. Reyes must surrender to his designated institution or to the Southern District of New York U.S. Marshals Service not later than **April 29, 2022**.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

3/20/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE